

# ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE ER REGULATORY CONTACT RECORD

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**Date/Time:** September 8, 2005 / 10:00 a.m.

**Site Contact(s):** K-H Karen Wiemelt, Susan Serreze

**Phone:** 303-692-2035 – CDPHE  
303/312-6312 - EPA  
303/966-4226 – DOE

**Agency:** CDPHE: Harlen Ainscough,  
EPA: Sam Garcia, Larry Kimmel  
DOE: Norma Castañeda

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**Purpose of Contact:** A meeting was held on September 8, 2005 to discuss the IHSS Group 700-3 UBC Closeout Report, IHSS Group 000-4 Closeout Report, and the 900 and NE areas HRR Write ups.

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**Discussion:** See meeting minutes below.

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**Contact Record Prepared By:** Susan Serreze

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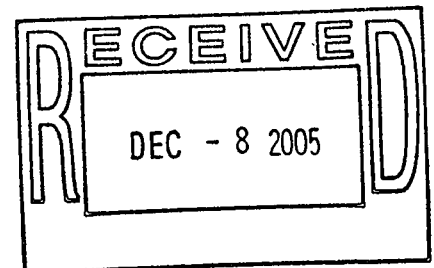
**September 8, 2005 Comment Resolution Meetings  
For  
Draft Closeout Report for IHSS Group 700-3 UBCs  
Draft Closeout Report for IHSS Group 000-4 NPWL  
900 Area HRR Write ups  
NE Area HRR Write ups**

A meeting was held on September 8, 2005 to discuss the IHSS Group 700-3 UBC Closeout Report, IHSS Group 000-4 Closeout Report, and the 900 and NE areas HRR Write ups.

Attendees

CDPHE: Harlen Ainscough  
EPA: Sam Garcia, Larry Kimmel, Todd Bechtel (Greystone)  
K-H Team: Karen Wiemelt, Gary Carnival, Susan Serreze

II. Report Status



ADMIN RECORD

## Issues

No Sitewide issues were discussed.

## Specific Comments

### **IHSS Group 700-3 UBC Draft Closeout Report**

The attached written comments were received from CDPHE and EPA. The following resolutions were agreed to:

- All comments will be addressed. No further discussion was needed.

DOE will receive additional comments from CDPHE on the IHSS Group 700-3 UBC Draft Closeout Report.

### **IHSS Group 000-4, NPWL, Draft Closeout Report**

The following resolutions were agreed to:

- Tables will be developed for valve vault and pipe disposition. Additional radiological information for the valve vaults left in place will be added to the report.

### **900 Area HRR Write up**

The attached written comments were received from CDPHE. EPA did not have comments on the 900 Area HRR Write ups. The following resolutions were agreed to:

- The five locations that were remediated in the Outer Lip area will be documented in the HRR and not in a separate closeout report.
- If remediation is conducted based on ORISE sampling, confirmation sampling will be documented in the HRR and not in a separate closeout report.

All other comments will be addressed. No further discussion was needed.

### **NE Area HRR Write up**

The attached written comments were received from EPA. The following resolutions were agreed to:

- All comments will be addressed. No further discussion was needed

## **Other Issues**

There were no other issues for discussion.

## V. Meetings

The next meeting will held on September 15, 2005 at 10:00 AM in the Breckenridge Room.

Colorado Department of Public Health and Environment

Hazardous Materials & Waste Management Division

Comments

Draft Closeout Report

For IHSS Group 700-3

Volume II

UBC 776, UBC 777, UBC 778 and Portions of IHSS 000-121, including Tanks 18

August 2005

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**Specific Comments:**

- 1.** **Executive Summary:** The declaration following the bullets, on page ES-2 is questionable due to extended interval sampling at locations CF45-129 through 132. With the exception of CF45-131 beginning at 4 feet, the sample intervals were 3-15 feet. Two of the four samples exceeded the WRW for Pu239/240 and suggest the potential for dilution of radionuclides in the 3-6 foot increment including the two samples reported to less than WRWs. The Division is aware that the UBC footprint of B776 was excavated to a depth of approximately 3 feet then backfilled to a depth of approximately 5 feet. This suggests that only the lower portion of the 3-6 foot interval subject to the 1 nCi/g limit may still be present.
- 2.** **Section 1.0:** Following the bullets on page 5, the 2005 HRR will be a comprehensive final rather than an annual update. Please modify
- 3.** **Table 2:** The sample interval for location CF45-011 should be shown as 0.6-1.1 feet, per Table 4.0 page 43, not 0.6-0.61.
- 4.** **Figure 2:** In comparison to Figure 4, CF45-130 may be just inside the C-Pit excavation boundary. The C-Pit excavation was to a depth of 16 feet; please determine whether the excavation sidewalls were vertical or gently sloped. If gently sloped the lower portion of the 3-6 foot interval, subject to the 1 nCi/g limit, may still be present. If gently sloped, please consider whether RCT scans were conducted at, or near, the location. The focus on statistical confirmation sampling precluded confirmation at that location.
- 5.** Location CF45-132 appears to be well within the C-pit excavation, however, please evaluate the potential for any of the original 3-6 foot increment to remain post backfilling.

- 6.** Location CF45-131 activities apparently were below background and not shown in Table 4 or on Figure 2. Nevertheless dilution over the eleven-foot sample interval must be considered. Please evaluate its location relative to the C-Pit, or other, excavations. If potentially present, check for RCT scans to disposition.
- 7.** **Table 4:** Please add, "...Above Background or Reporting Limits" to the title of the table.
- 8.** **Section 3.0:** In the second bullet, it is unclear why Attachment 14, specific to OPWL, has been referenced rather than Attachment 5. Perhaps both are appropriate.
- 9.** **Figure 4:** Please add a footnote to indicate B776 excavation to a depth of approximately three feet over the entire footprint (+/-).
- 10.** **Section 6.0:** Regarding the statement following the bullets, the Division agrees that the 1 nCi/g limit is applicable due to excavations that began in the 0-3 foot increment. Please make the distinction from the 3 nCi/g RFCA compliance threshold.
- 11.** **Table 13:** CF-45-129 through 132 appear to be NLR over a portion of their extended intervals. Please examine the database relative to other IHSS Groups and provide a consistent response. Figures 6 may need to be footnoted accordingly.

Appendix B: A statistical confirmation sampling approach was discussed with the Division prior to implementation. Please include that RCR and any other that are notable to the action.

**EPA Comments  
Draft Closeout Report  
IHSS Group 700-3, Volume II  
August 2005**

**Specific Comments**

1. **Page 31, Figure 2.** Several sampling points have been omitted from the figure. Data boxes are included; however, their corresponding locations are not identified (CE45-123, CE45-21, CE45-95, and CE45-127). Please correct the discrepancy.
2. **Page 32, Figure 3.** Sampling point CG46-036 has been omitted from the figure. A data box is included; however, the corresponding location is not identified. Please correct the discrepancy.
3. **Page 66, Section 3.0, second paragraph.** The first sentence states, "Accelerated action activities were conducted between November 2003 and July 2005." The table just below this statement shows accelerated activities were completed in August 2005. Please correct the discrepancy.
4. **Page 101, first paragraph, third sentence.** Reference is made to the four sampling locations that have SORs that exceed 1. The third sampling location, CE45-118, should be corrected to read CF45-118.
5. **Page 103, Section 6.0, Screen 1.** The last part of the sentence states, "however, these activities are at depths greater than 3 ft below final grade and less than 1nCi/g in compliance with RFCA." However, Figure 2 identifies one sampling location, CF45-122, with activities for Americium-241 (1.24 nCi/g) and Plutonium 239/240 (7.06 nCi/g) at levels greater than 1 nCi/g. Please revise this statement and reference, if necessary, appropriate contact record.
6. **Page 105, Figure 7.** Data boxes associated with samples CF45-118, CF45-119, and CF45-154 should be shaded red as there are analytical results that exceed WRW ALs.
7. **Page 107, Screen 3.** Please revise statement based on response to comment 5 above.
8. **Page 108, top of page.** Please revise statement based on response to comment 5 above.
9. **Page 108, Section 7.1, fourth bullet.** Please revise statement based on response to comment 5 above.
10. **Page 129, Section 14, second bullet.** Please revise statement based on response to comment 5 above.

**Colorado Department of Public Health and Environment**

**Hazardous Materials & Waste Management Division**

**Comments**

**Draft**

**PAC 900s**

**Comprehensive**

**Historical Release Report**

**2005**

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**General Comment:**

- 1.** The "Investigations" sections are inconsistently referred to PAC or IHSS Investigations. Please address.

**Specific Comments:**

**PAC REFERENCE NUMBER: 900-108:**

- 2. Historical Summary:** In the sentence preceding the bullets, please be specific as to what is indicated, i.e., contents of the trench.
- 3. IHSS Investigations:** The last sentence of the first paragraph and the subsequent sentence of the second paragraph are redundant.
- 4.** In the fourth paragraph, please specify the maximum values for the COCs, as previously agreed, for Division comparison to WRW levels.
- 5. No Further Action Recommendation:** Please cite the 2/14/2002 approval letter rather than stating that it meets NFA requirements.
- 6.** Is the information regarding treatment and disposal options in the second paragraph still necessary? If not, please delete.

**PAC REFERENCE NUMBER: 900-108:**

- 1. IHSS Investigations:** In Item 3, please delete "composite". The confirmation samples initially consisted of a grab sample and were subsequently changed to

composite samples. The closeout report adequately describes the addition of composites.

- 2.** Item No.6 states that plutonium did not exceed 1 nCi/g below three feet. However, the fourth bullet under NFA Recommendation states that soils greater than 1 nCi/g were removed "to a depth greater than 3 ft." These appear to be inconsistent. Please reconcile.

**PAC REFERENCE NUMBER: 900-119.1:**

- 1. Historical Summary:** The statement in the first paragraph that the site was within the Protected Area is incorrect in respect to the HRR Area 900 IHSSs, PACs and UBCs map. Perhaps Industrial Area was intended. Please address.
- 2. No Further Action Recommendation:** Please add a reference to the EPA approval of the 903 Lip IM/IRA, which included the removal of OU-1 soil hot spots.

**PAC REFERENCE NUMBER: 900-119.2:**

- 1. Historical Summary:** The statement in the first paragraph that the site was within the Protected Area is incorrect in respect to the HRR Area 900 IHSSs, PACs and UBCs map. Perhaps Industrial Area was intended. Please address.
- 2. No Further Action Recommendation:** Please add a reference to the EPA approval of the 903 Lip IM/IRA, which included the removal of OU-1 soil hot spots.

**PAC REFERENCE NUMBER: 900-141:**

- 1. IHSS Investigations:** Please specify the maximum values for the COCs, as previously agreed, for Division comparison to WRW levels.

**PAC REFERENCE NUMBER: 900-153:**

- 1. No Further Action Recommendation:** In the second bullet, "... is expected to exhibit continued degradation in the area" would be a stronger yet appropriate statement.

**PAC REFERENCE NUMBER: 900-155:**

- 1. Outer Lip Area:** Following the bullets, the statements concerning residual radionuclide activities will need to be qualified, in some manner, based upon recent oversight screening and sampling.

**PAC REFERENCE NUMBER: 900-176:**



- 1. IHSS Investigations:** In the fourth line of the section, please change “sil” to “soil”.

**PAC REFERENCE NUMBER: 900-184:**

- 1. No Further Action Recommendation:** In the second bullet, please delete, “The elevated”.

**PAC REFERENCE NUMBER: 900-213:**

- 1. IHSS Investigations:** The following changes are suggested: An additional 11 locations were sampled for radionuclides through the consultative process during the accelerated action ~~investigation~~ process to specifically investigate fill material under the pad.

**PAC REFERENCE NUMBER: 900-1310:**

- 1. No Further Action Recommendation:** Please provide the NFAA approval date.

**PAC REFERENCE NUMBER: 900-1311:**

- 1. PAC Investigations:** As this section references an additional figure, please ensure the number is provided in the final version

**PAC REFERENCE NUMBER: 900-1312:**

- 1. PAC Investigations:** Please specify the maximum values for the COCs, as previously agreed, for Division comparison to WRW levels.

**PAC REFERENCE NUMBER: 900-1313:**

- 1. PAC Investigations:** Please specify the maximum values for the COCs, as previously agreed, for Division comparison to WRW levels.

**PAC REFERENCE NUMBER: 900-1316:**

**Historical Summary:** Please change “RCLP level for chromium” to “TCLP

**Environmental Protection Agency**  
**HRR 2005 – NE Area**  
**August 2005**  
**September 8, 2005**

**Specific Comments**

1. **PAC Reference Number: NE-110, page 1-3, 4<sup>th</sup> paragraph.** The sentence states, "Groundwater was sampled in the IHSS 111.1 area where the COCs included VOCs, SVOCs, pesticides, metals, and radionuclides." Please insert "which is east of IHSS 110" after "IHSS 111.1" for better readability and understanding. Additionally, there are minor grammatical errors in this paragraph.
2. **PAC Reference Numbers: NE-111.2, NE-111.3, NE-111.5 through NE-111.8, page 1-15, second paragraph.** This paragraph states that WRW ALs were exceeded in Trench T-8 at depths greater than 3 feet below ground surface. Please include concentration levels in this discussion.
3. **IHSS Number 142.1 – 142.4, page 1-22, second paragraph.** Please identify the table presented on this page. The table is currently identified as "??-??". Additionally, should the release identified in late 2004/early 2005, in the A- series drainage, also be included in this table, or at a minimum mentioned somewhere in the write-up?
4. **IHSS Number 142.1 – 142.4, page 1-24, No Further Action Section.** The Draft Data Summary Report for IHSS Group NE-1, Pond Summary, is referenced. This document has not been approved by the agencies. Once approved, this section should be revised to reflect language in the final document.
5. **IHSS Number 142.5 – 142.9, page 1-26, Dates of Operation or Occurrence.** Pond B-4 is the only pond identified in the section. Please include operation dates for the other B-series ponds. Additionally, minor grammatical and formatting issues exist throughout the write-up.
6. **PAC Reference Number: NE-1409, page 1-68, second paragraph.** Please revise this last sentence of this paragraph to include the actual years that the collection system was dismantled and Building 910 and Temporary Modular Storage Tanks were demolished. Additionally, please include a reference to NE-1409 on the figure.
7. **PAC Reference Number: NE-1412 and NE-1413, Historical Summary, page 1-74, first paragraph, third and fifth paragraphs.** As stated in the title of this write-up, it pertains to Trenches T-12 and T-13. However, the third sentence does not include Trenches T-12 and T-13, but the fifth sentences states they are included in another HRR write-up. Please correct this discrepancy.

Required Distribution:

M. Aguilar, USEPA  
S. Bell, DOE-RFFO  
J. Berardini, K-H  
B. Birk, DOE-RFFO  
L. Brooks, K-H ESS  
M. Broussard, K-H RISS  
L. Butler, K-H RISS  
G. Carnival, K-H RISS  
N. Castaneda, DOE-RFFO  
C. Deck, K-H Legal  
S. Gunderson, CDPHE  
M. Keating, K-H RISS  
G. Kleeman, USEPA  
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Additional Distribution:
